

**DEPARTMENT OF ENVIRONMENTAL QUALITY
PERMITTING AND COMPLIANCE DIVISION**

PROGRAMMATIC ANALYSIS

Waste and Underground Tank Management Bureau – Solid Waste Program

INTRODUCTION

Project Name: Household Hazardous Waste Collection Event

Project Location: Variable

Project County: Variable

DESCRIPTION OF PROJECT – SUMMARY OF PROPOSED ACTION

The Department is consolidating, in one programmatic review, an analysis of a proposed plan of operations for a Household Hazardous Waste (HHW) collection event. HHW is defined as:

“Hazardous waste, or other special wastes of concern, generated by households, or conditionally exempt small quantity generators, that could otherwise be placed in a Class II Landfill”.

HHW collection events are designed to remove HHW or other wastes of special concern, such as paints or electronic equipment, from the waste stream going into municipal solid waste landfills. HHW collection events licensed by the Department are finite and limited in duration - they are normally one to two day events, with a maximum licensable period of one-week. With the exception of licensed Class II landfill sites, the HHW collection events may not be held at a site more than twice per year.

The plan of operations would apply to all HHW collection events where there is no potential for impact to surface-water or ground-water and where there are no cultural resources, wetlands or threatened or endangered plant or animal species. Such events may occur on Federal or State properties, on currently licensed Class II landfill sites, or on private properties. The license application form to be used for these events is included in Appendix A. This form provides an outline of the specific information needed regarding the plan of operations, information specific to the event, and information about the sponsoring applicant. If the Department concludes the completed application meets the criteria set out in this programmatic analysis, no further analysis under the Montana Environmental Policy Act (MEPA) would be required.

PURPOSE AND NEED

The Department has proposed a standardized plan of operations for HHW collection events to maximize the efficiency of the decision-making and licensing process for the sponsoring applicant. This documentation provides a categorical exclusion from the more detailed, standardized application process and environmental analysis.

AGENCY ROLES AND RESPONSIBILITIES

The Department is responsible for ensuring activities proposed under the Solid Waste Management Act are in compliance with the Act and with air and water regulations. Licenses issued pursuant to these regulations do not confer any property rights to a licensee. Each licensee is responsible for obtaining any special use permits and complying with other agency, county, or local/city restrictions when the events are conducted on Federal, State, or local lands.

ALTERNATIVES

No additional concerns were identified, therefore, there are no additional alternatives considered in this analysis other than the No-Action Alternative required under MEPA.

NO-ACTION

Under the No-Action Alternative, the Department would require each applicant to apply for individual licenses using the current HHW collection event registration form. This existing process issues an individual Environmental Assessment (EA) because of the materials collected, sponsoring applicants, and proposed event locations. Appendix B contains a copy of the current HHW Collection Event Registration Form.

PROPOSED PLAN OF OPERATIONS

Under this alternative, the Department would use a standardized, more structured process to work with the applicant proposing the HHW collection event. Appendix A contains the application form outlining and defining the information needed regarding the plan of operations for the HHW collection event.

General Requirements:

- Waste that does not meet the definition of HHW will be prohibited from the event.
- Access during the collection event will be controlled through the use of barriers or other structures that minimize public contact with the different types of HHW materials collected.
- The sponsoring applicant will have personnel on-site during the event that have been trained in accordance with OSHA 29 CFR 1910.120 to identify, label, and place the HHW in the appropriate containers for final treatment, disposal, or recycling. Documentation of personnel training will be included with the HHW collection event license application.
- The sponsoring applicant will develop and provide a site plan that details the floor plan and location of the collection, processing, and storage areas for the HHW collection event.
- The sponsoring applicant will develop and provide an Emergency Procedures Plan.
- The sponsoring applicant will provide the proposed treatment, disposal, and recycling procedures.
- The sponsoring applicant will develop and provide a list of prohibited materials. The list of prohibited materials will be posted at the HHW collection site.
- The HHW collection event must comply with the requirements of the Montana Solid Waste Management Act and other Montana environmental laws and regulations as well as city and county ordinances.

- The HHW collection event is finite and limited in duration, and may not be held more than twice per year at a site.
- Each HHW collection event is issued an individual license.

IMPACTS AND AFFECTED ENVIRONMENTS

The level of impacts to the physical, biological, social, and economic environments have been reviewed and are presented in Tables 1 and 2. There would be no impacts to the existing environment during the HHW collection event.

TABLE 1 - PREDICTED IMPACTS OF THE PROPOSED PROJECT ON THE PHYSICAL & BIOLOGICAL ENVIRONMENTS

RESOURCE	LEVEL OF IMPACT ¹					
	Major	Moderate	Minor	None	Unknown	Appendix
1. Terrestrial and Aquatic Life and Habitat				✓		
2. Water Quality, Quantity, and Distribution				✓		
3. Geology and Soil Quality, Stability and Moisture				✓		
4. Vegetation Cover, Quantity and Quality				✓		
5. Aesthetics				✓		
6. Air Quality				✓		
7. Unique, Endangered, Fragile or Limited Environmental Resources				✓		
8. Demands on Environmental Resources of Water, Air, and Energy				✓		
9. Historical and Archaeological Sites				✓		

¹ CUMULATIVE IMPACTS: No impacts are anticipated as the events are only for the collection of HHW with treatment, storage, disposal or recycling occurring off-site at regulated facilities. Event licenses will be issued after the submittal of a complete application and the Department's review and approval of the HHW event site plan, operational plan, and collection plan.

TABLE 2 - PREDICTED IMPACTS OF THE PROPOSED PROJECT ON THE SOCIAL & ECONOMIC ENVIRONMENTS

RESOURCE	LEVEL OF IMPACT ¹					
	Major	Moderate	Minor	None	Unknown	Appendix
1. Social Structure and Mores				✓		
2. Cultural Uniqueness and Diversity				✓		
3. Local and State Tax Base and Tax Revenue				✓		
4. Agricultural or Industrial Production				✓		
5. Human Health				✓		
6. Access to and Quality of Recreational and Wilderness Activities				✓		
7. Quantity and Distribution of Employment				✓		
8. Distribution of Population				✓		
9. Demands for Government Services				✓		
10. Industrial and Commercial Activity				✓		
11. Locally Adopted Environmental Plans and Goals				✓		

¹ CUMULATIVE IMPACTS: No impacts are anticipated as the events are only for the collection of HHW with treatment, storage, disposal or recycling occurring off-site at regulated facilities. Event licenses will be issued after the submittal of a complete application and the Department's review and approval of the HHW event site plan, operational plan, and collection plan.

PREFERRED ALTERNATIVE

The Department's preferred alternative is to adopt the general Household Hazardous Waste Collection Event license application and plan of operations as described in this programmatic analysis without modifications.

RECOMMENDATIONS FOR FURTHER ENVIRONMENTAL ANALYSIS

☐ EIS ☐ More Detailed EA ☒ No Further Action

Rationale for recommendation: This licensing process for HHW collection events would be a more efficient way for applicants to apply for event licenses and the Department to review those applications. There would be no impact to the existing environments during the HHW collection events, as the events are only collection events with the HHW treatment, disposal, or recycling activities occurring at off-site regulated facilities. The HHW collection events license would apply to one event. The materials collected would be removed for proper treatment, disposal, or recycling immediately following the conclusion of the licensed event.

APPENDIX A

**DEPARTMENT OF ENVIRONMENTAL QUALITY
PERMITTING AND COMPLIANCE DIVISION
WASTE AND UNDERGROUND TANK MANAGEMENT BUREAU
SOLID WASTE PROGRAM
P.O. Box 200901
HELENA, MT 59620-0901
PHONE: 406-444-5300
FAX: 406-444-1374**

**LICENSE APPLICATION
HOUSEHOLD HAZARDOUS WASTE COLLECTION EVENT**

Section 1 – General Information		
Applicant Name: <i>(If licensed Class II facility, provide facility name and contact information)</i> Applicant Title:	Applicant Address:	Phone: Fax:
Hazardous Waste Consultant: Name: _____ Title: _____ Address: _____ Phone: _____		
Hazardous Waste Disposal/Recycling Facility: Facility Name: _____ Facility Contact: _____ Title: _____ Facility Address: _____ EPA ID Number: _____ Phone: _____		
<hr style="border-top: 1px dotted black;"/> Facility Name: _____ Facility Contact: _____ Title: _____ Facility Address: _____ EPA ID Number: _____ Phone: _____		
<hr style="border-top: 1px dotted black;"/> Facility Name: _____ Facility Contact: _____ Title: _____ Facility Address: _____ EPA ID Number: _____ Phone: _____		
<hr style="border-top: 1px dotted black;"/> Facility Name: _____ Facility Contact: _____ Title: _____ Facility Address: _____ EPA ID Number: _____ Phone: _____		
Hazardous Waste Transporter: Name: _____ Contact: _____ Address: _____ Phone: _____ EPA ID Number: _____		

Section 2 – Site Location Information

<i>Proposed Site Location Address:</i>	<i>Legal Description of Proposed Site Location:</i>	<i>Is property owned by applicant?</i> []Yes []No <i>If not, provide name/address of lessor who holds title to the property</i>
<i>Total Acreage Proposed for the Event:</i>	<i>Population to be served:</i>	<i>Name:</i>
<i>Proposed Accumulation Dates and Method of Storage:</i>		<i>Address:</i>

Section 3 – HHW Event Information/Attachments

Provide a description of proposed treatment, final disposal, or recycling procedures to be used:

The following attachments are required:

- o Site Plan** - Plan view delineating the location of the waste screening, collection, processing, and storage areas for HHW, site ingress and egress, emergency evacuation routes.
- o Operational Plan** that includes waste acceptance criteria, waste rejection criteria, provisions for the separation of reactive, ignitable, and corrosive wastes, spill control/containment methods, emergency contact information, event contingency and emergency evacuation procedures.
- o HHW Collection Plan** that provides a summary of the expected sources, types, and quantities of HHW to be collected.

Section 4 - Certification

This is to certify that I have personally examined and am familiar with the information in this application and all attached documents. To the best of my knowledge, information, and belief, the submitted information is accurate and complete.

Applicant Signature

Date

APPENDIX B

**PERMITTING & COMPLIANCE DIVISION
WASTE AND UNDERGROUND TANK MANAGEMENT BUREAU
WASTE MANAGEMENT SECTION
PO BOX 200901
HELENA, MT 59620-0901
PHONE: (406) 444-5300
FAX: (406) 444-1374**

**APPLICATION FOR REGISTRATION
HOUSEHOLD HAZARDOUS WASTE COLLECTION PROGRAM**

A. General Information

1. Name of Applicant _____

Address: _____ Phone Number: _____

2. Program Coordinator: _____

Address: _____ Phone Number _____

3. Hazardous Waste Consultant: _____

Address: _____ Phone Number: _____

4. Hazardous Waste Disposal/Recycling Site(s): _____

Address: _____ Phone Number: _____

Address: _____ Phone Number: _____

5. Hazardous Waste Transporter: _____

Address: _____ Phone Number: _____

**APPLICATION FOR REGISTRATION
HOUSEHOLD HAZARDOUS WASTE COLLECTION PROGRAM**

6. Is an EPA Identification Number Required by Hazardous Waste Disposal/Recycling Facility?
Yes () No () If yes what are their names and identification number?

Name: _____ Identification Number: _____

Name: _____ Identification Number: _____

7. Are site plans included with application? Yes () No ()

They should delineate the location of the collection, processing, and storage areas for HHW.

8. Floor plans and details for the collection, processing, and storage areas included in the application?
Yes () No ()

The collection area should be designed to contain spills and leaks, secured to control access, meet all applicable National Fire Protection Association codes, and, if applicable, covered to exclude rain water.

9. Operational plan included with application? Yes () No ()

APPLICATION FOR REGISTRATION HOUSEHOLD HAZARDOUS WASTE COLLECTION PROGRAM

a) Please fill in the following chart addressing the expected sources, types, and anticipated quantities of HHW to be collected.

[illegible]

**APPLICATION FOR REGISTRATION
HOUSEHOLD HAZARDOUS WASTE COLLECTION PROGRAM**

b) Please describe the proposed treatment, final disposal, or recycling procedures to be used and the location(s) of where each step will occur.

c) What control methods would be used to deter unwanted waste and waste generators from the collection program?

d) Please attach a copy of the negotiated contract between the program coordinator and the proposed hazardous waste consultant.

e) What is the proposed accumulation time and method of storage? _____

f).What type of personnel training program will be used for the collection workers? _____

g) What is your budget for this program?

h).Describe briefly the public education program to be used for the event(s)._____

**APPLICATION FOR REGISTRATION
HOUSEHOLD HAZARDOUS WASTE COLLECTION PROGRAM**

10).Please attach the following information:

- a) A contingency plan and the possible emergency procedures to be followed at the event.
- b) Maintenance plan for the event.
- c) The general provisions for ignitable, reactive, and incompatible wastes.
- d) All other pertinent information.

B. Certification

This is to certify that I have personally examined and am familiar with the information in this application and any attached documents. I have also read the *Household Hazardous Waste Management in Montana* document produced by the Montana Department of Environmental Quality. To the best of my knowledge, information, and belief, the submitted information is accurate and complete.

Applicant's Signature

Date